

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and)	D.T.E. 01-20
Energy on its own Motion into the Appropriate Pricing, based)	
upon Total Element Long-Run Incremental Costs, for)	
Unbundled Network Elements and Combinations of Unbundled)	
Network Elements, and the Appropriate Avoided Cost Discount)	
for Verizon New England, Inc. d/b/a Verizon Massachusetts')	
Resale Services in the Commonwealth of Massachusetts.)	

**WORLDCOM, INC.'S FOURTH SET OF
INFORMATION REQUESTS TO VERIZON**

WorldCom, Inc. hereby requests that Verizon provide the data, information and documents described below. The Department's Ground Rules concerning Information Requests are incorporated herein by reference.

1. Refer to the Verizon Panel Testimony dated May 4, 2001 at page 78, line 20 through page 79, line 1. With respect to "the long standing industry practice of allocating at least two distribution cable pairs per-zoned residential unit" provide the following documents and information:
 - a. Identify when this "industry practice" first began and provide documentation sufficient to confirm how long this has been the "industry practice."
 - b. Provide all documents concerning the rationale(s) for this "industry practice," including but not limited to all documents concerning the rationale(s) from the perspective of:
 1. outside plant engineering;
 2. end-user service quality;
 3. the potential for end-user service disruptions;
 4. economic costs and benefits.
 - c. To the extent not already provided in response to 1.b., above, provide all documents concerning the optimization of distribution cable pair allocation, including but not limited to all documents concerning the optimization of distribution cable pair allocation from the perspective of:

1. outside plant engineering;
 2. service quality;
 3. the potential for end-user service disruptions;
 4. economic costs and benefits.
- d. Has Verizon historically followed this “industry practice”? If the answer is anything other than an unqualified affirmative, describe in detail how Verizon’s historical practices have diverged from the “industry practice” and provide all documents concerning Verizon’s divergence from the “industry practice,” including but not limited to all documents concerning Verizon’s rationale for diverging from the practice from the perspective of:
1. outside plant engineering;
 2. service quality;
 3. the potential for end-user service disruptions;
 4. economic costs and benefits.
- e. Has this “industry practice” evolved or otherwise changed over time? If the answer is anything other than an unqualified negative, describe in detail how the practice has evolved or changed, and provide all documents concerning the evolution or change(s) in the “industry practice,” including but not limited to all documents concerning the evolution or change(s) from the perspective of:
1. outside plant engineering;
 2. service quality;
 3. the potential for end-user service disruptions;
 4. economic costs and benefits.
2. Refer to the Initial Panel Testimony dated May 4, 2001, page 79, lines 4 through 6.
- a. Describe in detail what is meant by the “statistical peaks in per customer demand.” The description should include, but not be limited to, identifying: the data used in generating the statistics; how the data used to generate the statistics is gathered; the formulae for how the statistics are calculated; the manner in which the statistics are used; the frequency with which data is gathered; the frequency with which statistics are generated.
 - b. Describe in detail the underlying statistical principles that justify the propriety of the “two-pairs per unit assumption.”

- c. Provide substantiation, including but not limited to all data, schedules, assumptions, calculations and workpapers, indicating how “the two-pairs per unit assumption accommodates the statistical peaks in per customer demand.”
- 3. Refer to the Initial Panel Testimony dated May 4, 2001, page 79, lines 14 through 16.
 - a. Describe in detail what is meant by “the most mature demographic areas” and provide all documents concerning the criteria used to assess the maturity of demographic areas.
 - b. Identify the person(s) responsible for assessing demographic area maturity and describe in detail what training such person(s) receive regarding the assessment of demographic area maturity.
- 4. Refer to the Rebuttal Testimony of Joseph Gansert dated July 18, 2001, page 6, lines 8 through 11.
 - a. Describe in detail the “Verizon MA standards” and provide all documents concerning these standards, including but not limited to all documents evaluating the propriety of the standards from the perspective of:
 - 1. outside plant engineering;
 - 2. service quality;
 - 3. the potential for end-user service disruptions;
 - 4. economic costs and benefits.
 - b. Describe in detail what is meant by “market characteristics” and provide all documents concerning the criteria used to assess “market characteristics.”
 - c. Identify the person(s) responsible for assessing “market characteristics” and describe in detail what training such person(s) receive regarding the assessment of “market characteristics.”
- 5. Refer to the Rebuttal Testimony of Joseph Gansert dated July 18, 2001, page 11, lines 20 through 22. Describe in detail the “statistical principles underlying proper distribution cable design” and provide all documents concerning these statistical principles.

Respectfully submitted,

WORLD.COM, INC.

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Dated: New York, New York
July 27, 2001

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing upon each person designated on the attached service list by email and either U.S. mail or overnight courier.

Dated: New York, New York
July 27, 2001
